

REMARKS

I. Introduction

In response to the Office Action dated December 17, 2003, claims 2 and 3 have been cancelled, and claim 1 and 4 have been amended. Claims 1 and 4-21 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Allowable Subject Matter

In paragraph 5, the Office Action indicates that the subject matter of claims 3, 4, 15, and 16 would be allowable if written in independent form including all of the limitations of the base claim and any intervening claims. The Applicant acknowledges the Office Action's indication of allowable subject matter, and has amended claim 1 to place claims 1-12 in allowable form, but respectfully traverses the rejection of claims 13-21.

III. Claim Amendments

Applicant's attorney has made amendments to the claims as indicated above. These amendments were made solely for the purpose of expediting allowance of the subject claims, and with the intent of pursuing further claim scope in continuing patent applications.

IV. Office Action Objections

In paragraph 1, the Office Action objects to the specification due to a number of informalities. The Applicant thanks the Examiner for pointing out these errors, and has amended the specification in response to these objections. With the indicated amendments, the Applicant believes the specification is appropriately corrected.

V. The Cited References and the Subject Invention

A. The Lo Reference

U.S. Publication No. 2002/0026504, issued February 28, 2002 to Lo discloses a customer premises equipment autoconfiguration system. The system includes a search module configured to select a set of configuration values and to create a discover packet including the set of configuration

values. The discover packet is transmitted to attempt a connection with a network access device. If no response packet is received from the network access device, the search module selects another set of configuration values and creates another discover packet. If a response packet is received from the network access device, the search module stores the correct configuration values from the header of the response packet into a configuration register. A memory stores a subset of all possible configuration values including commonly used values.

B. The Kikinis Reference

U.S. Patent No. 5,960,073, issued September 28, 1999 to Kikinis et al. discloses a method and apparatus for providing an interactive home agent with access to call center functionality and resources. A call center system supports remote agent stations through a network by establishing a data link between a computer platform at the remote agent station and a CTI-processor connected to a telephony switch at the call center, and switching incoming calls from the call center to a telephone at the remote agent station while sending data pertaining to the calls via the data link to the computer platform at the remote agent station to be displayed. Data pertaining to calls is retrieved from a data base at the call center and sent via the data link to be displayed on a video display at the remote agent station. The data can include scripts for an agent at the remote station. Call center services are supported by cooperation between software at the CTI processor and the computer platform at the remote station. In one embodiment the data link, once established, is kept open while calls continue to be switched to the remote station. In another, after an initial log in, dial up is done from the remote station upon detecting calls from the call center by a TAPI compliant device, and a reduced log in is performed at the CTI processor to save time. In a third alternative, the CTI processor, via a modem bank adapted for dialing, establishes the data connection each time a call is switched from the call center to the remote station. A plurality of remote stations may be thus supported.

VI. Office Action Prior Art Rejections

In paragraph (2), the Office Action rejected claims 1, 2, and 5-9 under 35 U.S.C. § 102(e) as being anticipated by Lo, U.S. Publication No. 2002/0026504 (Lo). In the interest of expedited prosecution and with the intent of pursuing additional claims in continuation patent applications, the

Applicant has amended claim 1 to recite the features of allowable claim 3, and believes that claims 1 and 4-12 are now allowable.

In paragraph (3), the Office Action rejected claims 10-12 under 35 U.S.C. §103(a) as being unpatentable over Lo. The Applicant believes this rejection is moot in light of the above-described amendments.

In paragraph (4), the Office Action rejected claims 13, 14, and 17-21 under 35 U.S.C. §103(a) as being unpatentable over Lo in view of Kikinis, U.S. Patent No. 5,960,073 (Kikinis). Applicant respectfully traverses these rejections.

Claim 13 recites:

a relay for switching a connection between (i) said DSL circuit and a first pair of lines of said analog telephone line, and (ii) said DSL circuit and a second pair of lines of said analog telephone line;

The Office Action acknowledges that the Lo reference does not disclose “a relay for switching a connection between a DSL circuit and a first pair of lines and a second pair of lines”, but indicates that the Kikinis reference discloses a home having two pair of lines 127 and 129.

In fact, Kikinis discloses two lines, each connecting with a PSTN. One of the lines is used for telephonic communication, and the other is used for data communication:

In a preferred embodiment of the present invention agent station 126 and call center 101 have a dual connection. One of the two connections is a telephone link between the home agent's telephone 133 and telephony switch 109 at the call center. In various embodiments of the invention a plurality of outgoing call ports are reserved for home agent connection. One such line 117 is illustrated in FIG. 1 for the telephone link from switch 109 to home agent station 126, which is completed from the PSTN via line 127 to the home agent's station. The other connection is a data connection between the home agent's PC and data services at the call center. In a preferred embodiment this link is made via a telephony link 129 from home agent station 126 via the PSTN to CTI processor 111 at the call center. Lines 127 and 129 at the home agent station may be in one instance two POTS lines (plain old telephony service), or the B channels of an ISDN connection (2B+D). (col. 5, lines 11-27)

According to the Office Action, it would have been obvious to one of ordinary skill in the art at the time the invention was made to “have the two line implementation applied to the modem of Lo so that either line can be intermittently selected for broadband services.”

Nothing in the Kikinis reference even remotely teaches a relay for switching a connection between a DSL circuit and first pair of lines of an analog telephone line and a second pair of lines of the (same) analog telephone line. Kikinis teaches two lines ... one used for data, and the other for

voice. The Applicant can ascertain no reason for intermittently switching between a voice and a data line, especially for the use described in Kikinis (providing a remote station for a call center, an application where typically both are required). Further, even if Kikinis taught switching between two PSTN lines, it does not teach switching between pairs of lines of the same PSTN line, as described in claim 13.

Accordingly, even when combined, Lo and Kikinis do not teach the Applicant's invention, and there is no suggestion or motivation to combine the references as suggested.

Claims 14 and 17-21 are allowable for the same reasons as claim 13.

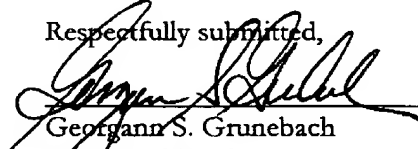
VII. Dependent Claims

Dependent claims 14-21 incorporate the limitations of their related independent claims, and are therefore patentable on this basis. In addition, these claims recite novel elements even more remote from the cited references. Accordingly, the Applicant respectfully requests that these claims be allowed as well.

VIII. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,


Georgann S. Grunebach
Reg. No. 33,179
Attorneys for Applicant(s)

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Bldg. R11, MS A109
P. O. Box 956
El Segundo, California 90245